

### **REMARKS**

In the Office Action, claims 1-13 and 16-52 were pending and claims 1-13 and 16-52 were rejected. In this response, claim 31 has been amended. Therefore, claims 1-13 and 16-52 are presented for examination.

Claim 31 was rejected as failing to comply with the enablement requirement. Applicants have amended claim 31, to clarify that XML is a data format.

Claims 11 and 12 were rejected as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Examiner notes that claim 11 describes the devices being removable, while claim 12 describes the devices being permanently attached. Applicants note that both claim 11 and claim 12 depend on claim 1. Therefore, there is no contradiction in having alternative, non-compatible options. This is similar to a system claiming a bucket, with the bucket being described as blue in claim 2, and red in claim 3. This type of claiming is clearly permissible. Therefore, Applicants respectfully request withdrawal of this rejection.

Claims 1-6, 9-13, 16-48 and 51-52 were rejected as being anticipated by U.S. Patent 5,319,751 to Garney.

Garney discusses a system in which removable system resources -- such as expansion memory boards, parallel or serial input/output (I/O) ports, read only memory (ROM) or flash memory expansion boards, computer network interface cards, modem cards, smart cards, or other removable system resources or special feature mechanisms (generally denoted feature cards or cards) -- are inserted into a slot on a computer system. (Garney, column 3, line 23-34). The card includes a device driver information block (DDIB) header 305, device driver stub code image 307, and full device

driver code 309. (Garney, column 3, line 52-55).

In Garney, the device driver stub code image 307 is uploaded to the host device, and used to connect to the full device driver code 309, to enable the host device to interact with the removable system resource. (Garney, column 3, line 63 to column 4, line 7). However, nowhere does Garney discuss "identifying at least one particular host device that is connected to the first device, including determining communication information allowing communication between the first device and the particular host device." Rather, Garney assumes that the host device's operating system is known to the removable system resource. Specifically, Garney states: *"Upon insertion of card 301 into the computer system, the device driver stub code image 307 is read from card memory area 303 and transferred into an area of computer system memory 102. The device driver stub code is then executed by the processor of the computer system from computer system random access memory."* (Garney, column 6, line 67 to column 7, line 4). Thus, it can be seen that in Garney there is only one "Device driver stub code image 307" which is automatically selected & transferred to the host (computer system memory 102). Garney does not teach or suggest the use of multiple types of host devices, thus the feature of "identifying the particular host device" is not taught or suggested by Garney.

Claim 1 recites in part "identifying at least one particular host device that is connected to the first device, including determining communication information allowing communication between the first device and the particular host device, and determining command information allowing the first device to invoke execution of the application or driver of interest at the particular host device". As noted above, Garney does not teach

or suggests multiple possible hosts. In fact, Garney teaches away from this feature, by specifically stating that *"The next five DDIB header fields (i.e. fields 411, 413, 415, 417, and 419) are all the same values contained within a standard operating system device driver header. Specifically, these five parameters are contained within the DOS (Disk Operating System developed by Microsoft, Corp., Redmond, Wash.) device driver header which is well known to those of ordinary skill in the art."* (Garney, column 7, line 27-34). Therefore it is clear that Garney does not teach or suggest "identifying a particular host device." The removable system resource of Garney performs no identification, but upon insertion immediately transfers the device driver stub code image to the host. Therefore, Garney does, not anticipate claim 1, and claims 2-13 and 16-40 that depend on claim 1.

Similarly, claim 41 recites in part "identifying the second device upon connection to the first device, said subsystem initiating communication between the two devices; uploading the device driver of interest from the first device to the second device". As noted above Garney does not teach or suggest identifying the second device upon connection the first device. Therefore, claims 41, and claims 42- 50 which depend on it, are not obvious over Garney.

Similarly, claim 51 recites in part "an application/driver uploader to upload an object of interest onto the host device, the object of interest determined based on the identity of the host device determined by the physical manager ". As discussed above, Garney does not teach or suggest an object of interest that is determined based on the identity of the host device. Rather, Garney discusses automatically uploading the device driver stub, when the removable system resource is connected to the host

device. Therefore, no such determination is made in Garney. Therefore, Garney does, not anticipate claim 51, and claim 52 that depends on it.

Claims 7-8 and 49-50 were rejected as being unpatentable over Garney in view of U.S. Patent US005928325A to Shaughnessy et al. (hereinafter "Shaughnessy").

As noted above, Garney does not teach or suggest "identifying at least one particular host device that is connected to the first device." Since in Garney's system that host is always predetermined, no such identification step is taught or suggested.

Shaughnessy does remedy the shortcomings of Garney discussed above with respect to parent claims 1, and 41 respectively. Therefore, claims 7-8 and 49-50 are not obvious over the combination of Garney in view of Shaughnessy.


Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,  
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